

Antrim Township Industrial Pretreatment Program

Standard Operating Procedure No. 7

Public Access to Information

Issue Date June 2017

Revision No. 0

Scope

This procedure describes how the Township handles public requests for information associated with the pretreatment program.

Overview

Industrial User information defined as “effluent data” must be made available to the general public upon request and cannot be claimed as confidential. Such “effluent data” which must always be made available to the public includes:

- General description of the location and nature of the source in order to identify and/or distinguish it from other sources;
- Information necessary to determine the identity, amount, frequency, concentration, temperature or other water quality characteristics of any pollutant(s) which a facility is authorized to discharge;
- Information necessary to determine the identity, amount, frequency, concentration, temperature or other water quality characteristics of any pollutant(s) that has been discharged;
- Production data at facilities subject to production-based categorical pretreatment standards.

Other data submitted by Industrial Users other than that defined as “effluent data” above may be claimed confidential and withheld from public review.

Procedures

Confidential Business Information Requests

Steps

- ☐ 1. Review Industrial User request.
 - Information for which confidentiality is requested must be stamped with “Confidential Business Information” over all parts for which protection is sought.
- ☐ 2. Determine whether or not information requested for confidentiality is considered “effluent data.” If the information is effluent data, the request must be denied.
- ☐ 3. Notify IU verbally of request determination (approved or denied).
- ☐ 4. If denied, follow up with written notice of the denial to the IU.
 - Notice should be sent by certified mail, return receipt requested.
 - Notice should contain opportunity for IU to appeal the Township’s decision within 15 days.

- ☐ 5. If confidentiality request is approved, confidential information must be kept in the locked drawer at the WWTP.
 - Keys to confidential information drawer shall be held by the Pretreatment Coordinator.
- ☐ 6. IU information approved as Confidential Business Information shall not be provided to the public under a Right-to-Know request (see below), unless the Township is required to provide such information under the Pennsylvania Right to Know Law, or any other law concerning access to public records.

Public Information Requests

Steps

- ☐ 1. All public information requests should be handled through the Township's Right-to-Know Officer.
- ☐ 2. All IU and pretreatment information shall be kept in the designated pretreatment filing cabinet at the wastewater treatment plant.
- ☐ 3. Information determined to be Confidential Business Information shall not be made available for public review through a Right-to-Know request.